

THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF PENNSYLVANIA

DAVID J. CATANZARO,

Plaintiff,

VS.

LYKART TECHNOLOGIES LLC,  
GROWKART, TRANSFORM SR  
BRANDS LLC, KMART, KMART.COM,  
SEARS, SEARS.COM, ALPHABET  
INC., GOOGLE LLC, YOUTUBE.COM,  
POSHMARK INC., STL PRO, INC.,  
TARGET CORPORATION,  
TARGET.COM, TOTALHILL.COM,  
MICROSOFT CORPORATION, INC.,  
APPLE INC. and MOZILLA  
CORPORATION

Defendants.

Case No. 3:22-cv-1754

Judge Joseph F. Saporito, Jr.

Referred to: Phillip J. Caraballo

JURY TRIAL DEMANDED

FILED  
SCRANTON

JUN 06 2025

PER

  
DEPUTY CLERK

**Plaintiff's Notice Regarding Third-Party Inquiry  
by Defendant Apple**

Plaintiff respectfully notifies the Court that, on information and belief, counsel for Defendant Apple contacted counsel for a previously dismissed party (Target Corporation) shortly after Target's dismissal was entered, inquiring about the terms of the settlement between Plaintiff and Target.

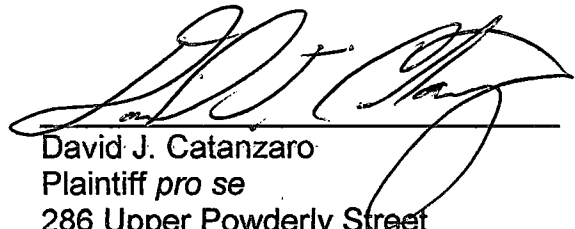
According to Target's counsel, the inquiry was made on or around the day the dismissal was filed and sought clarification about whether there was any non-

confidential information that could be shared. Target's counsel declined to respond. Plaintiff raises this matter solely to ensure a full and transparent record before the Court. Defendant Apple has argued in its prior communications that Plaintiff's claims are baseless and meritless. Plaintiff believes Apple's post-dismissal inquiry to a third party is inconsistent with that assertion and may suggest a more calculated litigation approach than previously indicated.

Plaintiff does not allege that any violation of confidentiality occurred, but includes this factual context to assist the Court in evaluating Apple's position and any request for relief.

Date June 6, 2025

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'D. Catanzaro', is written over a horizontal line.

David J. Catanzaro  
Plaintiff *pro se*  
286 Upper Powderly Street  
Carbondale, PA 18407  
Phone: (570) 936-9262  
E-mail: [davidjosephus@aol.com](mailto:davidjosephus@aol.com)

**CERTIFICATE OF SERVICE**

I, David J. Catanzaro, hereby certify that on June 6, 2025, a true and correct copy of Plaintiff's Notice Regarding Third-Party Inquiry by Defendant Apple was served as follows:

**For Represented Defendants:**

Pursuant to Fed. R. Civ. P. 5(b)(2)(C), service was made by **U.S. Mail** to **one counsel of record** for each represented defendant at their official firm mailing address. As a courtesy, copies were also sent via **email** to all additional known counsel of record for the respective parties.

**Served by First Class U.S. Mail:**

**Stephen H Barrett**

DLA Piper LLP  
1650 Market St  
Suite 4900  
Philadelphia, PA 19103

**Rachael D Lamkin**

Baker Botts LLP  
101 California Street  
Suite 3200  
San Francisco, CA 94111

**Kelly J. Fermoye**

Faegre Drinker Biddle & Reath LLP  
2200 Wells Fargo Center  
90 South Seventh Street  
Minneapolis, MN 55402

**Erika Warren**

Warren Kash Warren LLP  
2261 Market Street No. 606  
San Francisco, CA 94114

**For Unrepresented Defendants:**

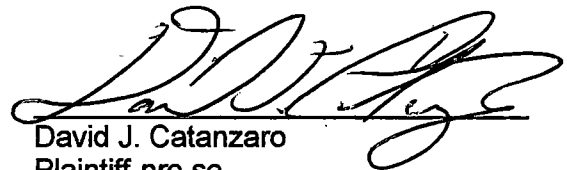
The following two defendants have not appeared in this case and are not represented by counsel. Copies of the foregoing document were served by First Class U.S. Mail to the last known business address shared by both entities:

**Lykart Technologies, LLC. and GrowKart**

30 N Gould St Suite 5707  
Sheridan, WY 82801, US.

These defendants are presently in **default**, and Plaintiff reserves the right to move for entry of default as appropriate.

Date June 6, 2025

A handwritten signature in black ink, appearing to read 'David J. Catanzaro', written over a horizontal line.

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Plaintiff *pro se*  
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